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FILED
DISTRICT COURT OF GUAM

SEP 23 2005

**MARY L.M. MORAN
CLERK OF COURT**

IN THE UNITED STATES DISTRICT COURT

FOR THE TERRITORY OF GUAM

11 UNITED STATES OF AMERICA,) CRIMINAL CASE NO. 03-00059
12 Plaintiff,)
13 vs.)
14 KAREN CHAE,) MOTION OF PARTIES FOR
15 YU MI CHUNG, and) DESTRUCTION OF EVIDENCE
16 PETER PARK,)
17 Defendants.)

18 The parties in the above-entitled matter hereby moves this Honorable Court for an entry
19 of an order permitting the Immigration and Customs Enforcement to destroy articles seized from
20 the possession of the defendant in this prosecution and bearing counterfeit marks as itemized in
21 Attachment A. This stipulation is made pursuant to 18 U.S.C. § 2320(b), which provides that
22 upon a determination by a preponderance of the evidence that an article in the possession of the
23 defendant bears counterfeit marks, the Untied States may obtain an order for the destruction of
24 such articles. The parties hereby motion that the articles seized by Immigration and Customs

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1 Enforcement as shown in Attachment A under this case number are counterfeit and thereby
2 subject to destruction.

3 09/21/05

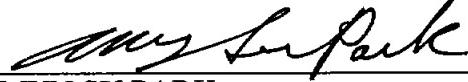
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9 
10 MUN SU PARK
11 Attorney for Defendant Karen Chae

12 
13 JOHN GORMAN
14 Attorney for Defendant Yu Mi Chung

15 LEONARDO M. RAPADAS
16 United States Attorney
17 Districts of Guam and NMI

18 By:

19 
20 KARON V. JOHNSON
21 Assistant U.S. Attorney

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2 **ATTACHMENT A**
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A.	12 Louis Vuitton bags	A.	30 Hunting World bags
B.	20 Louis Vuitton bags	B.	75 small Prada bags
C.	12 Louis Vuitton bags	C.	40 assorted Prada bags
D.	14 Louis Vuitton bags	D.	12 assorted Prada bags
E.	6 Louis Vuitton bags	E.	25 Chanel bags
F.	30 Louis Vuitton bags	F.	5 Chanel bags
G.	15 Chanel bags	G.	30 Louis Vuitton bags
H.	30 Louis Vuitton wallets	H.	12 Louis Vuitton bags
I.	20 Louis Vuitton wallets	I.	94 assorted Louis Vuitton flat goods
J.	15 Prada wallets	J.	23 Louis Vuitton straps
K.	25 Rolex watches	K.	15 assorted Chanel flat goods
L.	45 Prada emblems	L.	7 Cartier wallets
M.	20 Chanel shirts	M.	22 Dunhill wallets
N.	11 Gucci bags	N.	4 Hunting World wallets
O.	102 Louis Vuitton key straps	O.	8 assorted Prada flat goods
P.	54 Gucci key straps	P.	37 assorted Chanel jewelry
		Q.	7 Chanel belts
		R.	2 Gucci sunglasses
		S.	3 Chanel sunglasses
		T.	11 Cartier watches
		U.	30 Rolex watches
		V.	45 Chanel earrings
		W.	9 Bvlgari watches
		X.	48 Chanel clothing, assorted styles
		Y.	10 Fendi clothing
		Z.	6 Giorgio Armani jackets
		AA.	3 assorted Gucci clothing
		BB.	9 Gucci watches
		CC.	6 Cartier flat goods
		DD.	7 Chanel bags
		EE.	8 Louis Vuitton
		FF.	24 assorted tie clips
		GG.	12 Chanel emblems
		HH.	18 Prada cards
		II.	23 Prada labels
		JJ.	49 Chanel cards
		KK.	6 Louis Vuitton locks
		LL.	26 assorted representative samples